

Food and Drug Administration  
Center for Food Safety and Applied Nutrition  
Office of Special Nutritionals

ARMS#

12713



0 - FRONT

# MEDWATCH

THE FDA MEDICAL PRODUCTS REPORTING PROGRAM

For VOLUNTARY reporting  
by health professionals of adverse  
events and product problems

Form Approved OMB No. 0910-0291 Expires 12/31/94  
See OMB statement on reverse

FDA Use Only

Triage unit sequence #	7594
	42713

CFSAN Page \_\_\_\_ of \_\_\_\_

## A. Patient information

1 Patient identifier [redacted] In confidence	2 Age at time of event: 64 or Date of birth [redacted]	3 Sex <input checked="" type="checkbox"/> female <input type="checkbox"/> male	4 Weight 230 lbs or ____ kgs
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## B. Adverse event or product problem

1 <input checked="" type="checkbox"/> Adverse event and/or <input checked="" type="checkbox"/> Product problem (e.g., defects/malfunctions)	
2 Outcomes attributed to adverse event (check all that apply)	
<input type="checkbox"/> death (mo/day/yr)	<input checked="" type="checkbox"/> disability
<input checked="" type="checkbox"/> life-threatening	<input type="checkbox"/> congenital anomaly
<input checked="" type="checkbox"/> hospitalization - initial or prolonged	<input checked="" type="checkbox"/> required intervention to prevent permanent impairment/damage
<input type="checkbox"/> other: _____	
3 Date of event (mo/day/yr) 11-26-97	4 Date of this report (mo/day/yr) 1-9-98

### 5 Describe event or problem

Patient had a fairly extensive stroke. Although she had had a TIA a year prior, the Doc for felt an aspirin & blood pressure control was sufficient treatment. Several weeks before stroke, patient began a diet regimen on "Fit America" which entailed the taking of 4 pills containing Ephedrine. The Family has retained sample of product available to FDA.

### 6 Relevant tests/laboratory data, including dates

N/A

### 7 Other relevant history, including preexisting medical conditions (e.g., allergies, race, pregnancy, smoking and alcohol use, hepatic/renal dysfunction, etc.)

Patient had well-controlled hypertension a cardiac history of palpitations, Patient is 64 year old active woman - non smoker

## C. Suspect medication(s)

1 Name (give labeled strength & mfr/labeler, if known)		3 Therapy dates (if unknown, give duration from/to (or best estimate))	
#1 Fit America - Natural Weight Control Aid - for Fit America, Inc., Deerfield Beach, FLA 33441		#1 9/97 - 11-26-97	
#2		#2	
2 Dose, frequency & route used		4 Diagnosis for use (indication)	
#1 Up to 5 capsules / day		#1 Weight Loss	
#2 Each pill = 470 mg Ephedrine		#2	
6 Lot # (if known)		7 Exp. date (if known)	
#1 251702		#1 09/99	
#2		#2	
9 NDC # (for product problems only)			
#1			
#2			

10 Concomitant medical products and therapy dates (exclude treatment of event)

Dynacirc 2 pills / 5 mb  
Propranolol 80 mg  
1 Aspirin

## D. Suspect medical device

1 Brand name		4 Operator of device	
2 Type of device		<input type="checkbox"/> health professional <input type="checkbox"/> lay user/patient <input type="checkbox"/> other	
3 Manufacturer name & address		5 Expiration date (mo/day/yr)	
6 model #		7 If implanted, give date (mo/day/yr)	
catalog #		8 If explanted, give date (mo/day/yr)	
serial #			
lot #			
other #			

9 Device available for evaluation? (Do not send to FDA)
<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> returned to manufacturer on (mo/day/yr)

10 Concomitant medical products and therapy dates (exclude treatment of event)

## E. Reporter (see confidentiality section on back)

1 Name, address & phone #			
[redacted]			
2 Health professional?		3 Occupation	
<input type="checkbox"/> yes <input checked="" type="checkbox"/> no		Neighborhood Health Center	
4 Also reported to		5 If you do NOT want your identity disclosed to the manufacturer, place an "X" in this box. <input type="checkbox"/>	
<input type="checkbox"/> manufacturer			
<input type="checkbox"/> user facility			
<input type="checkbox"/> distributor			

000001



Mail to: MEDWATCH  
5600 Fishers Lane  
Rockville, MD 20852-9787

or FAX to:  
1-800-FDA-0178

# ADVICE ABOUT VOLUNTARY REPORTING

## Report experiences with:

- medications (drugs or biologics)
- medical devices (including in-vitro diagnostics)
- special nutritional products (dietary supplements, medical foods, infant formulas)
- other products regulated by FDA

## Report **SERIOUS** adverse events. An event is serious when the patient outcome is:

- death
- life-threatening (real risk of dying)
- hospitalization (initial or prolonged)
- disability (significant, persistent or permanent)
- congenital anomaly
- required intervention to prevent permanent impairment or damage

## Report even if:

- you're not certain the product caused the event
- you don't have all the details

## Report product problems – quality, performance or safety concerns such as:

- suspected contamination
- questionable stability
- defective components
- poor packaging or labeling

## How to report:

- just fill in the sections that apply to your report
- use section C for all products except medical devices
- attach additional blank pages if needed
- use a separate form for each patient
- report either to FDA or the manufacturer (or both)

## Important numbers:

- 1-800-FDA-0178 to FAX report
- 1-800-FDA-7737 to report by modem
- 1-800-FDA-1088 for more information or to report quality problems
- 1-800-822-7967 for a VAERS form for vaccines

## If your report involves a serious adverse event with a device

and it occurred in a facility outside a doctor's office, that facility may be legally required to report to FDA and/or the manufacturer. Please notify the person in that facility who would handle such reporting.

**Confidentiality:** The patient's identity is held in strict confidence by FDA and protected to the fullest extent of the law. The reporter's identity may be shared with the manufacturer unless requested otherwise. However, FDA will not disclose the reporter's identity in response to a request from the public, pursuant to the Freedom of Information Act.

The public reporting burden for this collection of information has been estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send your comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

Reports Clearance Officer, PHS  
Hubert H. Humphrey Building,  
Room 721-B  
200 Independence Avenue, S.W.  
Washington, DC 20201  
ATTN: PRA

and to:  
Office of Management and  
Budget  
Paperwork Reduction Project  
(0910-0230)  
Washington, DC 20503

Please do NOT  
return this form  
to either of these  
addresses.

FDA Form 3500-back

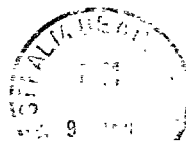
**Please Use Address Provided Below – Just Fold In Thirds, Tape and Mail**

## Department of Health and Human Services

Public Health Service  
Food and Drug Administration  
Rockville, MD 20857

## Official Business

Penalty for Private Use \$300



## BUSINESS REPLY MAIL

FIRST CLASS MAIL PERMIT NO. 946 ROCKVILLE, MD

POSTAGE WILL BE PAID BY FOOD AND DRUG ADMINISTRATION

# MEDWATCH

The FDA Medical Products Reporting Program

Food and Drug Administration

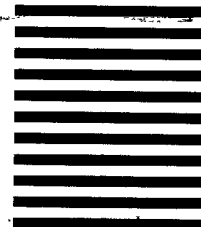
5600 Fishers Lane

Rockville, MD 20852-9787

RECEIVED  
CLINICAL RESEARCH  
& REVIEW/OSN HFS-452



NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES  
OR APO/FPO



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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
FOOD AND DRUG ADMINISTRATION

COMPLAINT / INJURY REPORT

1. COMPLAINT NUMBER

~~NYK-3416~~ NYK-3416

2. DATE OF COMPLAINT (Month / Day / Year)

3/3/98

3.

FORM OF COMPLAINT

a.

- (1) ☐ TELEPHONE  
(2) ☒ LETTER  
(3) ☐ VISIT

4. SOURCE OF COMPLAINT

a.

- (1) ☐ CONSUMER (3) ☐ TRADE SOURCE  
(2) ☐ GOVERNMENT (4) ☒ OTHER  
☐ L ☐ S ☐ F (Indicate in Remarks)

5.

COMPLAINANT IDENTIFICATION

a. NAME AND ADDRESS (Include ZIP Code)

MEDWATCH FORM RECEIVED BY CFSAN, HFS\_635

REPORTER: [REDACTED]

b. AREA CODE AND TELEPHONE NUMBER

HOME ( ) [REDACTED]

WORK ( ) [REDACTED]

6.

COMPLAINT OR INJURY

a. DESCRIPTION OF COMPLAINT / INJURY

Attached medwatch received via fax today from CFSAN, Project #12713 to be completed by April 3, 1997 (CFSAN deadline date). Please obtain (1) MEDICAL RECORDS

(2) COPY OF LABEL ONLY (no CR)

(3) ADVERSE REACTION QUESTIONNAIRE

to be completed by patient (if same as reporter)

b. DOES COMPLAINANT EXPECT ADDITIONAL FDA CONTACT?

- (1) ☒ NO (2) ☐ YES

(If "Yes" Explain in Remarks)

7.

INJURY OR ILLNESS RESULTED

- (1) ☐ NO  
(2) ☒ YES \*

\*(If "yes" complete items a through d)

a. EIB (HFC - 161) NOTIFIED

- (1) ☐ NO  
(2) ☒ YES

DATE:

3/4/98

b. TYPE SYMPTOMS

- (1) ☐ VOMITING  
(2) ☐ NAUSEA  
(3) ☐ DIARRHEA  
(4) ☐ FEVER  
(5) ☐ SKINEYE IRR.  
(6) ☐ HEADACHE  
(7) ☒ OTHER

ONSET (HR.)

c. ATTENDING HEALTH PROFESSIONAL?

- (1) ☐ NO (2) ☒ YES

(If "Yes" give name, address, and phone number)

TO BE OBTAINED: Dr. [REDACTED]

d. HOSPITALIZATION REQUIRED?

- (1) ☐ NO (2) ☒ YES

(If "Yes" give name, address, phone number and dates)

11/26/97- [REDACTED]

TO BE OBTAINED: [REDACTED]

STROKE of 64 yr old female, 230 lbs. prior TIP/high blood pressure

8.

PRODUCT AND LABELING

a. BRAND NAME

FIT AMERICA

b. PRODUCT NAME

NATURAL WEIGHT CONTROL AID

c. SIZE AND PACKAGE TYPE

capsules

d. NAME AND LOCATION OF STORE WHERE PURCHASED

Fit America Inc.

Deerfield Beach FLA, 33441

e. PACKAGE CODE / SERIAL NUMBER / ETC.

251702

f. DATE PURCHASED

not known

g. PRODUCT USED

- (1) ☐ NO (2) ☒ YES

Date: 9/97 to 11/26/97

h. AMT. REMAINING

Several Capsules

EXP. / USE BY DATE: 09/99

9.

MANUFACTURER / DISTRIBUTOR OF PRODUCT

a. HOME DISTRICT

FLA

b. C.F. NO.

NOCF

c. NAME AND LOCATION OF FIRM (Include ZIP Code)

Fit America Inc.

Deerfield Beach FL 33441

d. IMPORT PRODUCT

- (1) ☐ NO

- (2) ☐ YES

(not known)

10.

EVALUATION AND DISPOSITION

a. PROBLEM KEY WORD

- (1) CODE RX

- (2) DESCRIPTION Stroke

b. EVALUATION

- (1) ☐ NOT AN FDA OBLIGATION  
(2) ☐ OBLIGATION, NO VIOLATION  
(3) ☒ FDA ACTION INDICATED  
(4) ☐ INSUFFICIENT INFORMATION UNABLE TO EVALUATE

b. DISPOSITION

- (1) ☐ IMMEDIATE FOLLOW-UP  
(2) ☐ F / U NEXT EI  
(3) ☐ CLOSED WITHOUT FURTHER INVESTIGATION  
(4) ☐ REFERRED TO OTHER FEDERAL AGENCY (Closes File)  
(5) ☐ REFERRED TO STATE / LOCAL AGENCY (Closes File)  
(6) ☒ REFERRED TO OTHER FDA DISTRICT  
(7) ☐ REFERRED TO OCI

11. PRODUCT CODE

60CB E 03

12. INFORMATION COPIES TO:

- ☐ HFM-660 ☐ HFC-343  
☐ HFD-730 ☒ HFC-161  
☐ HFV-210 ☒ HFS-635

☒ OTHER [REDACTED]

13. REMARKS

All records (originals) to be sent FEDEX to Bridgette Wallace, HFS-636 FDA/CFSAN, 200 C Street, S.W., Wash. D.C. 20204 (Room: 5019)

Please forwarded a copy of all records to me and I will distribute a set to DEIO/FLA-DO as well as NYK-DO Complaint file.

14. NAME AND TITLE OF DISPOSITION OFFICIAL

Marlene H. Doherty, CSI/CCC

15. DATE

3/4/98

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## Adverse Reaction Questionnaire

Complaint Number: NYK-3416Investigator: Joseph MASELLI

Consumer Information		
Date of Report: <u>3/20/98</u> MM/DD/YY	Initial Report Source: <input type="checkbox"/> ORA Consumer Injury <input type="checkbox"/> Telephone <input type="checkbox"/> Correspondence <input type="checkbox"/> MedWatch <input type="checkbox"/> USP <input type="checkbox"/> PQRS <input type="checkbox"/> Poison Control <input type="checkbox"/> CDC	
Name: <u>[REDACTED]</u>	Gender: <input checked="" type="checkbox"/> F <input type="checkbox"/> M	Age: <u>64</u>
Race: <input checked="" type="checkbox"/> 1-White <input type="checkbox"/> 2-Black <input type="checkbox"/> 3-Asian/Pacific Islander <input type="checkbox"/> 4-Native American <input type="checkbox"/> 5-Hispanic <input type="checkbox"/> 8-Other <input type="checkbox"/> 9-Unknown		
Information on Adverse Reaction		
Date of Adverse Reaction: <u>11/26/97</u>	Give the site of consumption/ingestion (e.g. home, restaurant, office): <u>residence [REDACTED]</u>	
Previous Reaction to Product Type: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
The following information relates to the consumers' use of the product.		
Describe the adverse event (including symptoms and the time lapse from using product to onset of symptoms): <u>stroke in Evening, appx. 3-4 hrs. later after taking product.</u>		
How long did the symptoms last? <u>Admitted to hospital, ICU for appx. 8 days.</u>		
Give the circumstances of exposure (i.e. how much was taken, how was the product taken and how often was it taken, etc.): <u>up to 5 capsules a day, each 470 mg. by mouth.</u>		
List all Medication(s), Dietary Supplement(s), Food(s), and other product(s) used <u>at the time</u> of the event: <u>Aspirin 2 Tbs x 5 mg. daily</u> <u>Propranolol 80 mg. daily</u> , <u>1 Aspirin daily</u>		
Did event abate after use of suspected product stopped or dose reduced: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown		
Did symptoms reoccur after reintroduction of suspected product: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Not Applicable		
Did symptoms reoccur after using other products with the same ingredients: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> Not Applicable		
Medical Information		
Was a health care provider seen?: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Give health care provider's name, address and telephone number: <u>[REDACTED]</u>		
Occupation of Health Care Provider: <input checked="" type="checkbox"/> MD <input type="checkbox"/> Osteopath <input type="checkbox"/> Naturopath <input type="checkbox"/> Nurse <input type="checkbox"/> Pharmacist <input type="checkbox"/> Other (specify) _____		
What medical tests were performed and what were the results? <u>CAT SCAN, Admitted ICU</u>		
What was the medical diagnosis? <u>embolic hemorrhage stroke</u>		
What treatment(s) was given (e.g., drugs, other)? <u>Heparin 2x days, Progestral few days later (Progestyl?)</u>		
Were there any preexisting condition(s)/treatment(s)? <u>controlled blood pressure</u> (If YES, list them including allergies, and chronic diseases): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <u>TIA year previous</u>		

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## Product Category

Nyx-3416

## 1. Adverse reaction to:

☐ Medical Food (under medical supervision) ☐ Infant Formula☒ **Dietary Supplement** (a vitamin, an essential mineral, a protein, a herb or similar nutritional substances including botanicals such as ginseng and yohimbe, amino acids, extracts from animal glands, garlic extract, fish oils, oil of evening primrose; fibers such as psyllium and guar gum; compounds not generally recognized as food or nutrients, such as bioflavonoids, cozymase, germanium, nucleic acids, para-aminobenzoic acid, and rutin, and mixtures of these ingredients.)☐ Other (traditional food) \_\_\_\_\_Other Product Problems2. ☐ Foreign Object (specify): \_\_\_\_\_3. ☐ Other (specify): \_\_\_\_\_

## Information on Suspected/Alleged Product

Give the product name as listed on the label (including the recommended dosage/serving size, recommended duration of use, and indications for use as listed on the label):

lot # 251702      Fit America Natural Weight  
 Exp. 09/99      Control Aid. 470 mg each  
                          capsules, Deerfield Beach, FLA  
                          33441

List product ingredients (if ingredients are suspected to be present, but not verified, list as suspected):

☐ Check here if ingredients are unknown

Ephedrine

MA Huang

If a particular ingredient is suspected of contributing to the reaction, please indicate the appropriate category below:

☐ Aspartame☐ Color Additive (please specify) \_\_\_\_\_☐ Monosodium Glutamate☐ Sulfite☒ Other Ephedrine - MA Huang☐ UnknownIs the product label available, if yes submit a quality copy along with this questionnaire: ☐ Yes ☒ No ☐ UnknownProduct Sample Available: ☐ Yes ☐ No ☐ Unknown

## Outcome Attributed to Adverse Event:

(If yes, include pertinent medical records)

Death: ☐ Yes ☒ NoLife-Threatening: ☒ Yes ☐ NoHospitalization: ☒ Yes ☐ No (if YES, indicate if initial or prolonged) (1 cm) to 12/4/97 Disch.Required intervention to prevent permanent impairment/damage: ☒ Yes ☐ NoDid the adverse reaction result in a congenital anomaly: ☐ Yes ☒ No

tTO: Lori Love, M.D., Ph.D  
FROM: Constance J. Hardy (CJ) ✓  
DATE: 6/22/99  
SUBJECT: ARMS 12713—Additional Followup--Consumer Usage of Product/Signs and Symptoms Prior to Stroke

I spoke to Ms. [REDACTED] on 6/22/99 in an attempt to clarify her use of the product (Fit America Weight Control Aid) prior to her stroke on 11-26-97. Information in the adverse event questionnaire and the MedWatch form stated that she took "up to 5 capsules/d" from 9/97 – 11/26/97, but did not mention the dosing frequency.

Unfortunately because of her stroke and with the passage of time, Ms. [REDACTED] stated that she could not remember exactly what the product directions<sup>1</sup> were, or exactly how many capsules she took on a typical day. She definitely stated that she never took 5 capsules at the same time.

When asked whether she had any symptoms prior to her stroke, she stated that there were none, and that the stroke was sudden.

File: c:[REDACTED]/ephedrafu/fu12713.doc

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<sup>1</sup> The product directions state "Take capsules with 8 oz (240) ml water 1 hour before meals. Commence with low dose (one or two capsules per day) for 2-4 days, and then gradually build up to the most comfortable dosage level. Do not take more than one capsule every 4 hours, or exceed a maximum of 5 capsules per day...":

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DATE: 5/11/98  
TO: Keith S. Ehrlich, SI  
FROM: Angela K. Rhodes, CSO  
SUBJECT: F/U to CFSAN AE #12713, Complaint NYK-3416 per FLA-DO memo dated 4/2/98.

On 4/23/98, I contacted the medical records department, at [REDACTED] in [REDACTED] in order to obtain medical records for [REDACTED] as instructed in the 4/2/98 FLA-DO assignment memo. I spoke with [REDACTED] whom informed me that, as a government agency, a medical records release was not required from the patient in order to get copies of medical records. I faxed Ms. [REDACTED] a written request for records. (att: 1) These records were received and are attached. (ex: 1)

Due to the fact that medical records release authorization was not needed, a visit to the home of [REDACTED] was unnecessary. However, upon the advice of the CFSAN ARMS monitor, medical records release authorization forms were sent to Ms. [REDACTED] for her signature. (att: 2) Ms. [REDACTED] signed these release forms and returned them to [REDACTED] per my request. (att: 3) Ms. [REDACTED] also provided unopened bottles of the Fit America product in question. Labeling and a product insert were obtained from these bottles and are attached.

TO: Phil Delisle  
FLA-DO Complaint Coordinator

MAY 12 1998

The above investigator's memo reports follow-up with the subject complainant. Medical records and labeling were obtained as requested. A copy of brochures containing smoking cessation products is being forwarded to the OTC Compliance Branch for informational purposes. No further follow-up is planned by [REDACTED]

Keith S. Ehrlich  
Supervisory Investigator

O+att/ex: PRD  
cc+att/ex: FLA-DO/EF  
cc+att/ex: [REDACTED] EF  
cc+ex#3: HFD-312/Budich  
cc: KSE



[REDACTED]  
Memo 5/11/98

NYK-3416  
[REDACTED]

(ex: 2) Product was field destroyed. Ms. [REDACTED] also provided promotional literature associated with the Fit America product.

(ex: 3) [REDACTED] Ms. [REDACTED] husband, confirmed that the unopened product bottles provided to the FDA were the same lot number and product as that opened and used by his wife prior to her stroke.

Through discussions held on 4/20,23,24/98, it was determined that Ms. [REDACTED] description of events does not differ from information previously provided to NYK-DO. Therefore, an additional "Adverse Reaction Questionnaire" was not completed.

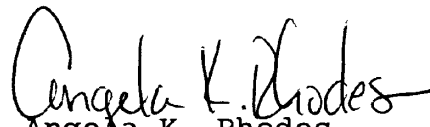
Promotional literature provided by Mrs. [REDACTED] includes information on a smoking cessation product, Nico-Fit. (ex: 3) A discussion with Kevin Budich, OTC Compliance Branch, indicates that information is currently being collected concerning smoking cessation products using herbs and nutritional supplements. Mr. Budich requested that promotional literature be forwarded to him.

ATTACHMENTS:

- 1 - FDA letter dated 4/24/98 to [REDACTED]
- 2 - Signed FDA Form 461, Authorization for Medical Records Disclosure
- 3 - FDA letter dated 4/24/98 to [REDACTED]

EXHIBITS:

- 1 - Medical Records
- 2 - Product Labeling
- 3 - Promotional literature

  
Angela K. Rhodes  
Investigator, [REDACTED]